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June 7, 2019

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket 18-336 – re. the National Suicide Hotline Improvement Act of 2018

Dear Commissioners,

United Way of Summit County improves lives by mobilizing the caring power of our community to advance the common good. Last year, we celebrated 100 years of service to our community and completed a merger with our local 2-1-1. We currently provide 211 service to Summit and Lorain Counties in Ohio, handling over 85,000 contacts per year by phone and text message.

We appreciate the opportunity to comment on the report of the North American Numbering Council as part of the process regarding Docket 18-336 that follows the requirements of the National Suicide Hotline Improvement Act of 2018.

United Way of Summit County endorses the recommendations included in the report of the North American Numbering Council. We do so for the following reasons:

- Suicide is a serious problem impacting our region and youth in particular. A three-digit number would help increase awareness of and access to suicide prevention services.
- There are currently no unused N11 numbers available and 211 is the most compatible existing number. In fact, while it is not currently marketed for suicide in our county, many counties in Ohio and across the US have blended 211 and crisis centers and do market 211 for suicide prevention.
- All 211s in Ohio must meet national standards for quality as proven by accreditation through the Alliance of Information and Referral Systems (AIRS). Part of our accreditation requirements are to provide training to our staff on how to do an initial lethality assessment of callers in crisis and have a protocol in place to initiate rescue or do a warm transfer to the appropriate crisis hotline. We take this requirement very seriously because even though we do not publicize our role as taking these calls, we sometimes receive suicide, domestic violence, and other crisis calls

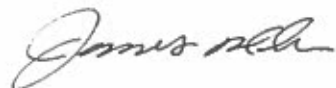
and our staff must be able to handle them appropriately. Many of the skills used to handle suicidal callers such as active listening, de-escalation, and building rapport are the same skills our staff use in handling callers facing other crises such as homelessness, divorce and addiction. We believe there is considerable overlap in the populations served by 211 and our local suicide prevention hotline. We also believe that our comprehensive database of services, including the wide range of mental health services indexed in our database, is a valuable resource that can be better used to support individuals after a crisis has passed.

- We are fortunate to have very good crisis hotlines in the two counties we serve. Our intention is to work on a local level to determine the best way to work together to provide access to crisis hotlines through 211 in an efficient and effective manner. This may involve a basic 'Press one/Press two' command that would place the user in one of two completely independent systems or some form of integration that provides economies of scale for the providers/funders and potentially improved service for the public. We are very open to what this looks like in our local community and could quickly put in place this change in call routing.
- We are working hard to always increase awareness of 211 as the entry point to all services in our community. We believe the marketing message to "call 211 if you need help" is very powerful and that it encompasses suicide as well as the wide range of topics 211 currently addresses.

In summary, United Way of Summit County endorses the core recommendations of the North American Numbering Council and encourages the FCC to adopt its detailed research and conclusions. We also believe that adequate funding should be provided to address the likely increase in people accessing suicide prevention services if a N11 number is assigned.

Thank you for your work in openly addressing this critical issue. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "James Mullen", written in a cursive style.

James Mullen
President and CEO